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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

C.M., on her own behalf and on behalf of her
minor child, B.M.; L.G., on her own behalf and
on behalf of her minor child, B.G.; M.R., on her
own behalf and on behalf of her minor child,
J.R.; O.A., on her own behalf and on behalf of
her minor child, L.A.; and V.C., on her own
behalf and on behalf of her minor child, G.A.,

Plaintiffs,

v.

United States of America,

Defendant.

No. CV-19-05217-PHX-SRB

**PLAINTIFFS'
SUPPLEMENT TO JOINT
STATUS REPORT**

A.P.F. on his own behalf and on behalf of his
 minor child, O.B.; J.V.S. on his own behalf and
 on behalf of his minor child, H.Y.; J.D.G. on his
 own behalf and on behalf of his minor child,
 M.G.; H.P.M. on his own behalf and on behalf of
 his minor child, A.D.; M.C.L. on his own behalf
 and on behalf of his minor child, A.J.; and R.Z.G.
 on his own behalf and on behalf of his minor
 child, B.P.,

Plaintiffs,

v.

United States of America,

Defendant.

No. CV-20-00065-PHX-SRB

On February 4, 2022, the parties in *C.M. et al. v. U.S.* (CV-19-05217) and *A.P.F. et al. v. U.S.* (CV-20-00065) submitted a Joint Status Report. Plaintiffs now respectfully submit this Supplement to update the information included in Plaintiffs' position regarding their request for 15 Policy Depositions (including Rule 30(b)(6) Depositions) included in that Joint Status Report.

On Friday, February 11, 2022, Defendant supplemented its Mandatory Initial Discovery Responses (MIDP) to include an additional 57 individuals who are likely to have information relevant to the parties' claims and defenses. Many, if not all, of these additional individuals appear to be government officials with information related to the creation, development, and implementation of policies that resulted in the separation of Plaintiff parents and their children. Further, at least half of these witnesses have never been identified by any party.

Respectfully submitted this 17th day of February, 2022.

/s/ Erik Walsh

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